

CHAPTER 170. INTERNATIONAL FIELD OFFICE INITIAL CERTIFICATION OF REPAIR STATIONS UNDER THE MAINTENANCE IMPLEMENTATION PROCEDURES OF A BILATERAL AVIATION SAFETY AGREEMENT

SECTION 1. BACKGROUND

1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance: 3045, 3240, 3650, 3653

B. Avionics: 5045, 5240, 5650, 5653

3. OBJECTIVE. This guidance details how an FAA certificated 14 Code of Federal Regulations part 145 repair station located outside the United States and subject to the terms of the Bilateral Aviation Safety Agreement (BASA) and Maintenance Implementation Procedures (MIP) concluded between the United States and foreign countries may qualify to be an FAA certificated repair station in accordance with 14 CFR part 145. The FAA and the European Aviation Safety Agency (EASA) hereinafter referred to as EASA have established the differences between EASA part-145 and 14 CFR part 145 and these differences are listed in the MIP as agreed to between the FAA and EASA. As a result a European-based EASA part-145 approved maintenance organization (AMO) when in compliance with FAA published maintenance special conditions may apply for an FAA 14 CFR part 145 certificate. This chapter must be used in conjunction with AC 145-7, Issuance of Repair Station Certificates to Foreign Approved Maintenance Organizations Under the Maintenance Implementation Procedures of a Bilateral Aviation Safety Agreement, current edition. The AC describes the steps to certificate an approved maintenance organization (AMO) located outside a territory of the United States as an FAA repair station in accordance with (IAW) the MIP of a BASA. At the time of publication, this chapter applies to Germany, Ireland, and France because each of these countries has signed a BASA/MIP with the United States.

NOTE: EASA is now responsible for publishing European Regulation, Policy and Guidance for aviation-related issues for both

European Union member states' National Aviation Authorities (NAA) and European industry. All existing European JAA/JAR 145 Approvals have been converted to EASA part 145 approvals as of November 28, 2004.

5. GENERAL.

A. FAA-certificated repair stations located outside the United States are under the provisions of 14 CFR part 145. The certification of foreign repair stations is a response to the need to perform maintenance on or an alteration/modification of aeronautical products subject to U.S. airworthiness regulations in foreign countries. The need to maintain aircraft and components outside the United States has grown with the corresponding increase of international air travel and the number of FAA-approved foreign-manufactured aeronautical products used by U.S. operators.

B. Similarly, other countries also have experienced an increase in the use of U.S. facilities to perform maintenance, alteration, or modification of aeronautical products subject to their National Regulations. The FAA and the National Aviation Authorities (NAA) have developed a system to eliminate duplicate activities because both the FAA and NAA have extensive inspection, surveillance, evaluation, and certification programs for their repair facilities. This is accomplished through the implementation of a BASA and its accompanying MIP.

C. The MIP is based on an FAA and NAA evaluation of part 145 and the NAA-compatible AMO regulations. This evaluation identified the areas where these regulations and guidance agree and where they differ. The requirements in part 145 that are not in NAA regulations and guidance for AMOs are in FAA Special Conditions in the MIP. As a result, an NAA

AMO complying with NAA regulations and guidance for AMOs and FAA Special Conditions in the MIP is in compliance with part 145.

D. Changes to NAA regulations and guidance material, part 145, and FAA Special Conditions will be reviewed by the appropriate FAA Headquarters office with responsibility for the subject matter to determine the impact on the BASA/MIP process and this handbook chapter. Changes that affect the BASA/MIP process will be reviewed by an FAA committee established under § 4.3 of the MIP. This committee will advise FAA International Field Offices (IFO) of the impact of such changes and any resolutions.

E. Background. Refer to Interim BASA/MIP Guidance.

(1) As part of the pre-MIP assessments and evaluation program, the FAA made a determination that the NAA's and EASA processes and procedures met or exceeded the FAA's requirements. The FAA, EASA, and NAA will provide each other with regulations, policies, guidance, practices, and interpretations relevant to these IPs, and will ensure that such documents are updated in a timely manner. In addition, any FAA, EASA, or NAA proposal to amend such documents should be provided to the other authority for review prior to the amendment being effected, consistent with their national laws and administrative procedures. FAA aviation safety inspectors (ASI) should note that this guidance would be applicable to many different countries; therefore, the surveillance report documents are referred to by a variety of different names, titles, and/or numerical identifications. In this document, we will reference EASA Form 6, Surveillance/Inspection Report, as the surveillance document. As part of the assessment, the FAA and EASA agreed upon an FAA Annex to EASA Form 6. In some cases, the NAA inspector must submit the forms and associated documents to the NAA regional or headquarters offices for review and conversion into the English language. The FAA agrees that the time frame for such translations is at the NAA's discretion but should be completed in a timely manner.

(2) Under the BASA/MIP agreement, the AMO is responsible for remaining in compliance with EASA part 145 and FAA Special Conditions. Under the BASA/MIP concept, the FAA will perform annual sampling inspections of repair stations located within a country that has signed a BASA/MIP with the

United States in accordance with guidance provided in volume 3, chapter 99. The FAA may elect to participate in internal audit programs of the NAA/EASA, or may review EASA audit reports of NAA compliance status of requirements that are covered under the BASA/MIP process. The purpose of the FAA participation or record review of internal audits is to confirm that all NAAs are standardized with EASA requirements and the agreement.

(3) The FAA has determined that the combination of scheduled sampling inspections and selected participation in NAA internal audits will allow the FAA to make a determination of NAA and repair station compliance with the terms and conditions of a BASA/MIP. This is a systems approach and complies with the FAA's intended approach for Risk Based Surveillance System (RSAM).

(4) Under the terms and conditions of the MIP, it is now the NAA's responsibility to confirm compliance with the MIP to the FAA, thereby reducing redundant surveillance, duplication of effort, and bureaucratic procedures by both agencies. The FAA confirmed during the MIP development process that the turnover of repair station surveillance will not compromise safety. The FAA is transferring the burden of surveillance and procedures, to the NAA and recognizing their system. In turn, the NAA is recognizing the FAA's system in the domestic United States. This system allows the FAA to retain enforcement capability while recognizing the procedures and abilities of the NAA.

(5) The FAA will continue to perform sample surveillance of repair stations to ensure continued compliance with the MIP by both the NAA and the repair station as described in this chapter. Periodically, the FAA will also participate in the internal evaluation process. In the case of EASA, this is accomplished by participation in EASA Maintenance Aviation Standardization Team visit.

NOTE: The FAA is currently in discussions with EASA to modify the current MAST concept, or create a new MIP system that will provide greater focus on MIP issues.

F. The following acronyms and definitions are used in this chapter:

(1) AMC — Acceptable Means of Compliance. EASA guidance material similar to FAA ACs.

(2) AMO — Approved Maintenance Organization. Many countries use this term in place of Certificated Repair Station.

(3) Appropriate Surveillance Form — FAA Annex to NAA surveillance report, which identifies MIP Special Conditions. (This will be identified in future FAA publications.)

(4) ASI — Aviation Safety Inspector.

(5) BASA — Bilateral Aviation Safety Agreement. Department of State and FAA format for international government-to-government agreements.

(6) CFRS — FAA-Certificated Foreign Repair Station.

(7) CL — Capabilities List. Identifies by make, model, and part number (if applicable) each component that the AMO/CFRS is authorized to maintain/alter.

(8) FAA — Federal Aviation Administration.

(9) FAA Annex to EASA Form 6 — FAA/NAA status report on an EASA part 145/part 145 organization identifying MIP FAA Special Condition items.

(10) 14 CFR — Title 14 of the Code of Federal Regulations.

(11) IFO — FAA International Field Office.

(12) EASA — European Aviation Safety Agency.

(13) EASA Form 6 — EASA AMO compliance checklist/surveillance/inspection report

(14) MIP — Maintenance Implementation Procedures. NAA-to-FAA agreement.

(15) MOE — Maintenance Organization Exposition. EASA AMO manual equivalent to the repair station manual/quality control manuals required by the FAA.

(16) NAA — National Aviation Authorities. Similar to the member countries of the EASA.

(17) NAA Required Manual — NAA-equivalent of FAA Repair Station Manual.

(18) NAA Regulations — National regulation for AMOs identified as similar to 14 CFR.

(19) NAA Requirements — NAA guidance material similar to FAA advisory or guidance material.

7. THE CERTIFICATION PROCESS—GENERAL INFORMATION.

A. General. The guidance provided in this chapter must be used in conjunction with AC 145-7, as revised (Interim BASA/MIP Guidance). A maintenance organization, approved under NAA regulations and guidance (or EASA part-145), that has signed a BASA/MIP with the United States can apply for a 14CFR part 145 repair station certificate using the procedures described in this chapter and AC 145-7, as revised. As a result of the BASA/MIP between the United States and the country in which the applicant AMO is located, many of the actions the FAA would have accomplished in a 14 CFR part 145 certification process for a foreign repair station are now accomplished by the applicant AMO's NAA. During the application procedure, the applicant AMO's NAA provides an application package to the AMO and is responsible for processing all the documentation required for 14 CFR part 145 certification. Up to the final certification phase, the FAA will have limited involvement in the certification process.

NOTE: All documents the applicant AMO provides to the FAA via the NAA must be in English. The ASI should advise the NAA that there are time restrictions for processing applications due to FAA resource availability. An application for certification must not remain dormant. A lack of applicant activity for any 12-month period during the certification process will result in termination of the application.

B. NAA Responsibilities.

(1) *Certification Process.* The applicant AMO can request initial 14 CFR part 145 certification using the guidance provided in AC 145-7, as revised. Guidance for renewing or amending an existing part 145 certification can be found in volume 2, chapter 171. The BASA/MIP agreement allows the FAA to accept the certification system of the BASA/MIP country. This allows the NAA the

flexibility to process an initial/renewal/amended repair station application IAW their system.

(2) *Preapplication Phase.* An AMO should inform its NAA of its intent to seek certification as a repair station under 14 CFR part 145 and the BASA/MIP agreement. On receipt of the preliminary inquiry, the NAA will provide the applicant AMO with a copy of AC 145-7, as revised. The NAA or applicant will inform the FAA of the potential applicant by providing the FAA with the information identified in AC 145-7, as revised, (VIS information). The applicant must supply the NAA with a statement of continuing need to maintain or alter U.S.-registered aircraft and/or aeronautical products being installed on U.S.-registered aircraft (see AC 145-7, as revised, for criteria of needs requirements).

NOTE: The FAA has no responsibilities in the preapplication phase. However, the NAA should alert the IFO of the potential application. The IFO must establish an office file (a pending list) for each applicant in order to keep an accurate record of pending applications. It is acceptable for this to be accomplished by a telephone call or FAX from the NAA; applicant must keep the NAA informed.

(3) *Formal Application Phase.* The FAA has no responsibility in this phase. The AMO will provide the NAA with all the required documents identified in AC 145-7, as revised.

(4) *Document Compliance Phase.* The FAA has no responsibility in this phase until the completed package has been forwarded to the FAA as discussed in section 2. The NAA will review the documents submitted by the applicant AMO to ensure they conform to applicable NAA requirements, FAA Special Conditions, and safe operating practices (as described in AC 145-7, as revised) such as those involving suspected unapproved parts (SUP). (The NAA may have regulations requiring an SUP's reporting procedure. In the case of EASA, compliance with EASA part 145.60, Occurrence Reporting, and the EASA-required incoming inspection procedures meet the intent of the FAA SUP program.) When filing SUP reports with the FAA the reports must be in the English Language.

(5) *Demonstration and Inspection Phase.* The NAA has primary responsibility in the demonstration and inspection phase. The inspection of the facility

will be done IAW the NAA procedures. The FAA will review the required documents during the certification phase. The NAA will process the required documents and inspection/surveillance report IAW AC 145-7, as revised.

C. *FAA Responsibilities.*

(1) *Certification Phase.* Once the NAA determines that the applicant AMO meets their AMO requirements and FAA Special Conditions, the NAA will recommend FAA certification. The NAA will complete the appropriate form that includes a signed endorsement/recommendation and the FAA Annex to EASA Form 6 or FAA/NAA-accepted equivalent documentation, which should include an NAA-signed endorsement to the FAA that the applicant AMO meets the NAA requirements and FAA Special Conditions. The FAA inspector who has geographic responsibility for the country in which the applicant AMO is located should receive the following documents from the NAA:

(a) The appropriate NAA surveillance form (or FAA Annex to EASA Form 6) that includes FAA Special Conditions and an NAA recommendation. There should be no outstanding findings for initial certification.

(b) FAA Form 8310-3, Application for Repair Station Certification and/or Rating, including a list of maintenance functions to be performed for the applicant AMO under contract by another maintenance organization. (The list of maintenance functions to be performed for the applicant AMO under contract by another maintenance organization approved by the NAA on behalf of the FAA. (See AC 145-7, as revised, for NAA procedure for approving list of functions to be contracted.)

i. The NAA must approve the list of function on initial certification, thereafter revisions to the list need to be approved. The list of functions must be available to the FAA on request and in a format acceptable to the FAA. (On renewal there is no need for the NAA to provide the list of functions unless revised, the FAA can sample the functions list during sampling inspections IAW volume 3, chapter 99 of this order.)

ii. A list of facilities performing contracted maintenance functions must include the name, and rating held by each organization. For noncertificated

facilities the list must identify the name of the organization, address and the function performed. (EASA countries may use an asterisk to indicate all FAA maintenance providers.)

(c) A copy of the NAA Approval Certificate, including Operations Specifications (OpSpecs) or the official NAA document that identifies the ratings and limitations authorized (EASA Form 3, including Approval Schedule).

(d) A copy of the CL is only necessary during initial certification.

(e) If applicable, a list of multiple facilities locations (see section 2 for content of list).

(f) If applicable, a list of line stations (see section 2 for content of list).

(g) A copy of the List of Effective Pages of the FAA required training program that includes NAA inspector signature and date of approval on behalf of the FAA. Or a letter to the AMO approving the training program on behalf of the FAA. (While not in effect until April 2006, early compliance is recommended.)

(2) *Issuance of Certificate.* Once the FAA has received and reviewed the above documents and determined that the applicant AMO has met the BASA/MIP requirements and has paid the appropriate fee (payment of fees may be accomplished in accordance with office procedures), the FAA will issue FAA Form 8000-4, Air Agency Certificate, and Automated Repair Station Operations Specifications, listing all applicable limitations. The FAA under the BASA/MIP has recognized the NAA rating system. Therefore, the OpSpec will reference the NAA rating and certificate number in the limitation section. The FAA certificate should reflect the appropriate FAA rating, which will be discussed later in this chapter. The FAA certificate and OpSpec must contain the appropriate BASA/MIP statement. The FAA will forward these forms to the NAA for distribution to the AMO. Once the AMO receives the OpSpecs it will sign the original and FAX or mail a copy of the signed OpSpec back to the FAA.

9. CONTINUING VALIDITY OF PART 145 REPAIR STATION CERTIFICATE.

A. The NAA should provide the FAA with a non-recommendation when the NAA has found significant safety issues and corrective action has not been taken.

B. The NAA will promptly notify the FAA of any investigation into noncompliance that could result in the loss of an AMO's certification, suspension, or penalty (in the case of the EASA, the suspension of its EASA part 145 approval/certification).

C. A basic MIP requirement is compliance with both NAA and EASA requirements; therefore, withdrawal of NAA approval/certification will result in withdrawal of FAA certification by the FAA as a result of noncompliance with the MIP and approved OpSpecs.

D. The FAA may undertake investigations or enforcement actions under FAA regulations and directives if not satisfied with EASA/NAA action.

E. The AMO must cooperate with any FAA investigation or enforcement action.

F. Any failure to comply with applicable requirements may result in enforcement action.

G. It should also be noted EASA/NAA has an obligation under the agreement to inform the FAA of serious finding thereby allowing the FAA to make the final determination of action to be taken.

11. FAA-CERTIFICATED REPAIR STATIONS WITH EXEMPTIONS. FAA-certificated repair stations granted exemptions under 14 CFR part 11 will continue to follow the BASA/MIP process for renewal, provided the NAA has been informed by the FAA of the details of the exemption and provided NAA with a current copy of the exemption.

13. APPROVED MAINTENANCE ORGANIZATIONS WITH DEVIATIONS. AMOs that have deviations/exemptions from NAA regulations and guidance (EASA part-145) may qualify for an FAA certificate. Such candidates represent unusual circumstances and a copy of the application and NAA deviation should be forwarded directly to FAA headquarters, AFS-300, for review and coordination prior to certification. Such deviations may require an exemption from 14 CFR.

15. PROTECTION OF PROPRIETARY DATA AND FREEDOM OF INFORMATION ACT (FOIA) REQUESTS.

A. Proprietary Data. Data submitted by an applicant AMO may be the property of that AMO or another entity. Release of those data by the FAA and the NAA (in the case of EASA-member NAA) is restricted under § 4.7(a) of the MIP. The FAA and the NAA (EASA-member NAA) will not copy, release, or show proprietary data obtained from either authority to anyone outside the FAA or NAA without written consent of the owner of the proprietary data.

B. Freedom of Information Act (FOIA) Requests. The FAA often receives requests from the public, under FOIA, to release information in its possession. Any information the FAA has in its possession must

be disclosed under FOIA unless it falls within certain exceptions, including trade secrets or financial or commercial data considered confidential or privileged. When the FAA receives a request for the release of information related to an AMO located in a country covered by a BASA/MIP, the FAA will advise the NAA of the AMO regarding any information that might be released. The FAA also may request the NAA's assistance, in cooperation with the AMO, in determining if the submitter would object to the release of this information, and which portions of the information received from the submitter or generated by the NAA might be withheld under FOIA exceptions (if any).

SECTION 2. PROCEDURES

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites:

- Knowledge of the regulatory requirements of 14 CFR parts 43 and 145
- Completion of the Airworthiness Inspector's Indoctrination course(s) or equivalent
- Previous experience with certification or surveillance of part 145 repair stations
- Completion of FAA-approved computer-based instruction training, course number 27012, when implemented
- Completion of the foreign and domestic repair station course 21058 or equivalent
- Completion of FAA approved computer based instruction training, course 27012 (currently under development)
- Completion of AFS-300/AEA-230 IFO interim guidance seminars (pending completion and publication of BASA/MIP training program)
- Completion of BASA/MIP training course currently under development
- Knowledge of Interim BASA/MIP Guidance

B. Coordination. This task requires coordination with:

- The applicant AMO
- The NAA of the country in which the applicant AMO is located
- The appropriate regional office
- FAA headquarters, AFS-300

3. REFERENCES, FORMS, AND JOB AIDS.

A. Reference: (current editions)

- 14 CFR parts 43 and 145

- Order 8300.10, Airworthiness Inspector's Handbook, volume 2, chapters 161, 163, 164, and 165, 171, 172, and volume 3, chapter 99
- AC 145-7, as revised Issuance of Repair Station Certificates to Foreign Approved maintenance organizations under the Maintenance Implementation Procedures of a Bilateral Aviation Safety Agreement
- AC 187-1, Flight Standards Service Schedule of charges outside the United States

B. Forms:

- FAA Form 8000-4, Air Agency Certificate
- FAA Form 8000-4-1, Repair Station Operations Specifications (or Automated Repair Station Operations Specifications)
- FAA Form 8310-3, Application for Repair Station Certification and/or Rating
- FAA Form 8400-6, Preapplication Statement of Intent (PASI), to be completed by FAA inspector based on information provided by the NAA
- NAA Approval Certificate and OpSpec or documentation defining the AMO's limitations (EASA Form 3, Approval Certificate and Approval Schedule)

NOTE: In some cases, the NAA has approved procedures for the AMO to make changes to its limitations or approved the use of a CL. In these cases, the applicant must submit the NAA-approved revision procedures. (See AC 145-7, as revised, for additional details.)

- NAA surveillance/inspection report (or FAA Annex to EASA Form 6), NAA Surveillance Report, and Recommendation for FAA Certification/Renewal/Amendment

C. Job Aids.

- **TBD no later than June 2006**

5. INITIAL CERTIFICATION APPLICATION.

A. Preapplication Phase (Initial) (NAA Responsibilities). Limited action required of FAA. The NAA should alert the FAA IFO that has geographic responsibility for the country in which the applicant AMO is located. The NAA will provide the FAA with the name, address, and rating being applied for and VIS data required by AC 145-7, as revised. The FAA must establish an accurate list of pending applicants.

NOTE: An AMO seeking certification under 14 CFR part 145 must hold a valid NAA Approval Certificate or EASA part-145 approval/certification and be located in an EU member country that has concluded a BASA/MIP with the United States. An AMO may not apply concurrently for a 14 CFR part 145 repair station certificate and EASA approval/certification. The applicant must show that it meets the necessity for the 14 CFR part 145 certification as described in the AC 145-7, as revised, paragraph 7.

B. Formal Application Phase (Initial). No action required of FAA. Review and acceptance of these documents is the responsibility of the NAA. Documents submitted to the FAA are discussed under the certification phase.

C. Document Compliance Phase (Initial). No action required of FAA. Review and acceptance of these documents is the responsibility of the NAA. Documents submitted to the FAA are discussed under the certification phase.

D. Demonstration and Inspection Phase (Initial). No action required of FAA. Review and acceptance of these documents is the responsibility of the NAA. Documents submitted to the FAA are discussed under the certification phase.

E. Certification Phase (Initial) (FAA Responsibilities).

(1) If the NAA oversight audit indicates that the applicant AMO is IAW NAA requirements/EASA part-145 and FAA Special Conditions, the NAA will complete the appropriate NAA surveillance form and FAA Annex, including a recommendation for FAA certification, and forward the complete application package to the appropriate FAA IFO. The FAA inspector will review all the documents in the

application package to ensure they are acceptable and there are no outstanding issues involving corrective action.

(2) The FAA inspector must receive the following documents from the NAA:

(a) FAA Form 8310-3, to include a list of maintenance functions to be performed for the applicant AMO under contract by another maintenance organization approved by the NAA on behalf of the FAA. (See AC 145-7, as revised, for NAA procedure for approving list of functions to be contracted.)

(b) A copy of the applicant AMO's NAA approval certificate and OpSpec or the appropriate NAA document (EASA approval certificate and Form 3 EASA Approval Schedule) that identifies the AMO's limitations. In some cases, the NAA has approved procedures for the AMO to make changes to its limitations by approving the use of a CL. In these cases, the NAA must submit the AMO's approved revision procedures. The FAA will not approve the revision procedures but will recognize the NAA's approval. FAA inspectors are to review the procedures to ensure they meet the basic requirements, such as AMO internal audit procedures that verify the AMO has the trained personnel, tools and equipment, data/manuals, and facilities to accommodate any revision to the CL. (See AC 145-7, as revised, for additional information.)

(c) A copy of the appropriate completed NAA surveillance form that includes FAA Special Conditions with an NAA recommendation, the FAA Annex to EASA Form 6, or FAA/EASA-accepted equivalent documentation. (See office files for sample.)

NOTE: The proper surveillance form must be completed for each line station and additional facility and accompany the certification package.

(d) If applicable, a list of multiple facilities/locations within that BASA/MIP country. A copy of the AMO manual supplement section that identifies the multiple facility location that the AMO intends on utilizing its FAA certificate privileges. (The list should include the address of each location, telephone and fax number, e-mail address if available, and identify the NAA office with oversight responsibility.)

(e) If applicable, a list of line stations. (The list should include the address of each location, telephone and fax number, e-mail address if available, and identify the NAA office with oversight responsibility.)

(f) A copy of the List of Effective Pages of the FAA required training program that includes the NAA inspector's signature and date of approval on behalf of the FAA or a letter to the AMO approving the training program on behalf of FAA. (Not in effect until April 2006; early compliance is recommended.)

7. REVIEW OF DOCUMENTS.

A. Review of FAA Form 8310-3. Form 8310-3 must include the NAA approval by signing and dating on behalf of the FAA listing maintenance functions to be performed for the applicant AMO under contract by another maintenance organization. The FAA inspector will review FAA Form 8310-3 to ensure it is complete and accurate, paying particular attention to the following:

(1) FAA Form 8310-3, part 1, should contain the applicant AMO's official name, doing-business-as name (if applicable), business address, and mailing address.

(2) FAA Form 8310-3, part 3, should contain all FAA ratings for which the applicant AMO has applied and be compatible with the applicant AMO's NAA ratings (or EASA part-145 ratings and its EASA Form 3 Approval Schedule). (Reference AC 145-7, as revised)

(3) FAA Form 8310-3, part 4, should include a list of any functions performed for the applicant AMO by a contractor as authorized in its FAA Supplement to its manual (in the case of EASA, to the MOE part 7).

NOTE: The FAA inspector should note that the EASA part 145 allows the AMO to appoint a person at an uncertificated facility to act on behalf of the AMO, provided that person is under the Quality Monitoring System of the AMO. The FAA does not recognize this procedure and caution should be used when reviewing the contracting functions to ensure this process is not included as FAA-acceptable.

(4) FAA Form 8310-3, part 5, should include the applicant AMO's corporate information, as specified, and contain an authorized signature. It may be either an original or a copy.

B. Review of Surveillance Form. The FAA inspector must:

(1) Ensure the form includes a copy of the appropriate completed NAA surveillance form that includes FAA Special Conditions with an NAA recommendation, the FAA Annex to EASA Form 6, or FAA/EASA-accepted equivalent documentation. There should be a completed form for each location listed as a line station or additional facility. (See AC 145-7, as revised, for requirement.)

NOTE: The information on the certification surveillance form need not all come from a single visit to the facility but may be an accumulation of information from multiple visits by the NAA.

(2) Review the NAA-submitted form, the FAA Annex to EASA Form 6, or FAA/EASA-accepted equivalent documentation to ensure that it has been completed and that the NAA recommendation has been signed.

NOTE: For initial certification the FAA inspector should ensure the NAA oversight audit was completed within 180 days/ 6 months of the NAA's certification recommendation. However, if the applicant AMO successfully completed NAA surveillance for a regulations and guidance/EASA part-145 oversight audit within the preceding 12 months, then the NAA is not required to conduct a review for compliance with the NAA regulations and guidance. However, the NAA will conduct an oversight audit for compliance with FAA Special Conditions.

(3) Review the appropriate NAA surveillance form (see office file for appropriate form) to ensure the form or attachments contain a summary of findings and corrective action noted during the surveillance. This is an initial certification so there should be no outstanding discrepancies/findings, nor should there be plans for corrective action.

(4) Ensure the appropriate NAA surveillance form (see office file for appropriate form) includes a

signed recommendation by the NAA to the FAA that the applicant AMO meets NAA regulations and guidance/EASA part-145 and FAA Special Conditions. The signed recommendation must include the statements listed below, as appropriate (the FAA will not issue a certification without a recommendation from the NAA).

(a) *Recommendation.* (See sample statement on FAA Annex to EASA Form 6). This maintenance organization is considered to be in compliance with NAA requirements (in the case of the EASA, part 145) and FAA Special Conditions with no significant findings/discrepancies outstanding at this time. It is therefore recommended that the FAA certificate this maintenance organization or renew the maintenance organization certificate IAW part 145, as appropriate.

(b) *Non-recommendation.* When termination of the initial certification process is recommended by the NAA, the NAA will provide the necessary information to terminate the process.

(5) Use PTRS codes 3653/5653 to open and close this job task, using the comment codes when appropriate. PTRS codes 3653/5653 will only be used when the NAA is doing surveillance on behalf of the FAA. PTRS codes 3650/5650 will only be used when the FAA performs the facility inspection.

C. Review of NAA Approval Certificate and Limitations Document OpSpecs or EASA Form 3, EASA part-145, Approval Certificate, and Approval Schedule. (See office file for sample approval certificate.)

(1) *General.* The FAA inspector must review the applicant AMO's NAA certificate and limitations document. The FAA inspector will add the appropriate rating to the FAA certificate (FAA Form 8000-4) by using the cross-reference chart in AC 145-7, as revised. This is normally a broad rating; the FAA OpSpecs will contain the limitations. The inspector will add the NAA rating as the limitation to the FAA OpSpecs.

(2) *Capabilities List (CL).* A CL is a limitations document that identifies articles by make, model, and part number, although in some cases it may be referred to by other names. It is located or referenced in the AMO's manual. When the NAA has approved the procedures for use and revision to a CL,

the FAA recognizes the NAA approval. However, the FAA will review the procedures document to confirm the rating applied for and verify that the procedures follow the Quality Monitoring System/Internal Evaluation Program approved by the NAA. This review applies to initial issuance of a CL. The FAA approval of the CL is accomplished by incorporating specific statements into the OpSpec (see paragraph 7C(3)(a) below). When determining FAA ratings that will apply to the FAA certificate, the OpSpec will use the NAA certificate number in addition to the statement under paragraph 7C(3)(a) that references a CL. (See AC 145-7, as revised, for scope and detail of CL.)

NOTE: The FAA inspector must be aware that, under the provisions of a BASA/MIP, the FAA will not issue a repair station certificate and accompanying rating(s) with privileges that exceed the scope of work permitted under the NAA approval limitations, EASA part-145, or the scope of any EASA certificate, rating(s), or Approval Schedule issued to an AMO.

(3) *Capabilities Document Description.*

(a) The use of a CL for both class and limited ratings is an effective way of identifying all articles for which an AMO has an established repair capability. Articles included on the list must be identified by make, model, and part number or assembly number, as applicable. Once the component or subassembly is identified on the CL, there is no need to list the individual parts contained in that component or subassembly. The AMO must have the proper equipment, personnel, materials, and technical data to maintain each article listed in the CL. The CL is an extension of the AMO's OpSpecs, and its use depends on the AMO establishing procedures for conducting self-audits of its facility and capabilities that are approved by the AMO's NAA and accepted by the NAA on behalf of the FAA. The self-audit programs are normally identified as Quality Monitoring Systems or Internal Evaluation Programs and are authorized by the FAA when the following statement is added to the AMO's FAA OpSpecs:

- "Maintenance or alteration functions limited to those make and model components shown on [AMO's] approved Capabilities Document number [XX], dated [XX/XX/XX], as revised." (Verify the statement.)

NOTE: Do not change the original issuance date.

(b) Once approved, a CL is identified by date and title on the repair station OpSpecs and becomes legally binding.

(4) *Procedures for Accepting Revisions to a CL.*

(a) In cases where the NAA has approved the AMO's Internal Evaluation Program and procedures, the AMO is authorized to revise the CL without additional approvals from the NAA and, as a result, the FAA. This approval will remain in effect unless otherwise notified by FAA. The AMO will be authorized to perform maintenance and alteration on those items added to the CL without any additional FAA or NAA approvals.

(b) When reviewing the NAA-approved procedures for the AMO to use a CL, the FAA inspector should confirm that:

- The AMO's procedures for revisions do not exceed the AMO's FAA rating
- The self-audit is complete for the articles being added, ensuring that the AMO has the technical data, equipment, and material
- There are trained personnel for the article being added, and the AMO has provided the NAA with a statement of perceived need IAW AC 145-7
- The AMO retains a record of its audit that verifies the above
- The procedures contain a provision to provide the FAA with a copy of the audit upon request

9. SPECIAL PROVISIONS FOR REPAIR STATIONS LOCATED OUTSIDE THE UNITED STATES. FAA inspectors must be aware of the following special provisions and situations:

A. Line Stations. The NAA may have issued an applicant AMO a single NAA certificate for facilities that include line stations; but under the BASA/MIP agreement, the FAA will recognize line stations that are listed in the FAA supplement of the AMO manual;

within the boundaries of the MIP country; and meet all NAA requirements and FAA Special Conditions; and use the same AMO manual and FAA supplement. These line stations will be under the surveillance purview of the NAA. Line stations that are located outside the BASA/MIP country will remain under the surveillance purview of the FAA and must obtain an individual repair station certificate or apply for a geographic authorization following the procedures in AC 145-7, as revised.

- The AMO must provide a list of line stations, as applicable (the list should include the address of each location, telephone and fax number, e-mail address if available, and identify the NAA office with oversight responsibility)

B. Additional Facilities/Locations.

(1) The AMO must hold a valid [EASA/NAA] certification and be in compliance with the most current NAA/EASA, part 145. The FAA may issue an AMO one certificate that covers multiple locations within the MIP country provided the additional locations are listed in, and utilizing, that AMO's MOE and FAA supplement.

(2) For AMOs that have multiple facilities under one certificate within the MIP country. The NAA must provide an FAA annex to the appropriate surveillance form that includes the NAA recommendation for each facility location that is listed in the FAA supplement.

(3) If applicable, a copy of the AMO manual supplement section that identifies the multiple facility location that the AMO intends on utilizing its FAA certificate privileges. (The list should include the address of each location, telephone and fax number, e mail address if available, and identify the NAA office with oversight responsibility.)

NOTE: Current 14 CFR part 145 allows the FAA to issue satellites repair station certificate for additional facilities located within the domiciled country. In accordance with the MIP and discussions with EASA that recognized EASA part 145 regulations that allows for multiple facilities locations to operate under one certificate within the MIP country. The FAA concluded that issuing satellite certificates within the country would

serve no purpose and recognition of the EASA system would meet the same requirement.

NOTE: The FAA normally cannot accept adding new line stations or new locations that would be listed under multiple facilities, between renewal cycles. It is not practical for the FAA and the NAA to add new locations to the repair station certificate when not considered part of a renewal, the administrative burden is beyond the scope of the BASA/MIP.

C. Geographic Authorizations. The FAA's geographic authorization policy is located in AC 145-7. Processes and procedures for issuing geographic authorization are located in volume 2, chapter 162.

NOTE: The geographic authorization policy is currently under review and may change.

D. Specialized Services Ratings/Processes.

(1) The FAA inspector may issue an equivalent specialized services rating to an applicant AMO under the provisions of a BASA/MIP if:

(a) The applicant AMO's NAA certificate and limitations (EASA Form 3) indicate that its scope of work includes a specialized services rating.

(b) The NAA assessment of the technical data used by the applicant AMO indicates that it originates from an FAA-approved source.

(2) A specialized services rating is usually issued to permit the performance of work requiring equipment and skills not ordinarily found at a repair station. All work performed under the provisions of a specialized services rating must be done IAW FAA-approved data; therefore, FAA issuance of a specialized services rating requires FAA-approved process specifications. The FAA inspector must ensure only FAA-approved process specifications are being used on U.S.-registered aircraft or aeronautical products intended for installation on U.S.-registered aircraft. This may require coordination with the appropriate FAA Aircraft Certification Office.

(3) Approval of hydrostatic testing is a responsibility of the U.S. Department of Transportation (DOT). The NAA will surveil/audit these facilities to ensure the organization meets the

NAA requirements and FAA Special Conditions. The NAA will also ensure that the organization has the appropriate current U.S. DOT Office of Research and Special Projects Administration (RSPA) approval.

E. FAA Supplement to AMO's Manual (MOE Part 7). No FAA action is required in review of the supplement. The NAA reviews and accepts the manual and FAA Supplement on behalf of the FAA. The NAA is responsible for ensuring the FAA Supplement and all subsequent revisions are in compliance with AC 145-7, as revised.

F. Fees.

(1) The FAA will not issue an FAA certificate and OpSpecs until it receives payment of the prescribes fee. The CHDO may make exceptions based on non-intentional delays that may occur in the transaction, or possible internal corporate procedures. The FAA CHDO will provide for additional time by providing a letter along with the certificate and OpSpec notifying the applicant that if the fees are not received within a reasonable time, the FAA certificate and OpSpecs will be suspended pending compliance with the fee requirement.

(2) The FAA inspector will notify the applicant AMO, in writing, of the fee for processing the part 145 repair station certificate. The applicant AMO will send this fee IAW the procedures prescribed by that IFO.

(3) The fee will be calculated as specified in AC 187-1, as revised, Flight Standards Service Schedule of Charges Outside of the United States.

G. Unsatisfactory Application. If the FAA inspector finds the documentation supporting an applicant AMO's initial application unsatisfactory, the inspector will prepare a memorandum or e-mail to the NAA indicating the deficiencies noted. The NAA, in turn, will notify the applicant AMO of the FAA's findings. All deficiencies noted by the FAA must be corrected within 60 days of the FAA's notification to the NAA for the application process to continue. If the application process is terminated, the FAA inspector must close out all remaining open PTRS files.

11. CERTIFICATION (INITIAL) DOCUMENT PREPARATION.

A. FAA Form 8310-3.

(1) Once the FAA inspector has determined that the applicant AMO's application package is acceptable, the FAA inspector will complete FAA Form 8310-3, parts 6 through 10.

(a) Part 6 will include a statement as follows: "The Repair Station Certificate Operations Specifications were issued under the Terms and Conditions of the BASA/MIP between the United States and [insert name of country]."

(b) Part 7 will be completed to indicate the FAA's findings and recommendation.

(c) Part 8 will be completed to indicate the date the NAA oversight audit was completed.

(d) Part 10 will be completed by the FAA ASI. (When the ASI signs part 10, they are signing for receiving the required information IAW the BASA/MIP process, not the inspection of the facility.

(2) *The inspector will issue:*

(a) FAA Form 8000-4 (see office file); and

(b) FAA Automated Repair Station Operations Specifications. (See office files; must include OpSpec A060.)

NOTE: The OpSpec must include the appropriate NAA certificate number. An FAA inspector must not issue an FAA Air Agency Certificate or Repair Station OpSpecs until the inspector confirms the prescribed fee has been received. In some cases the inspector may issue the certificate and operation specification pending payment. See AC 145-7, as revised or paragraph 9F of this chapter for acceptable procedures for delay of payment of fees.

B. FAA Form 8000-4. The FAA inspector will complete FAA Form 8000-4 IAW the guidance in chapters 161 and 162, paying particular attention to the following:

(1) *The applicant AMO's FAA ratings will be indicated on FAA Form 8000-4. The FAA inspector should ensure that the appropriate FAA rating is applied to the certificate using the cross-reference chart in AC 145-7, as revised.*

(2) The FAA inspector must adjust the 14 CFR part 145 certificate's expiration date to coincide with the NAA recommended surveillance schedule which should be noted on the appropriate surveillance form. However, the date to be indicated after "shall continue in effect" should not be more than 12 months from the original (initial) certificate issue date. For initial certification, a certificate can only be issued for a period of 12 months. After the initial certification, certificate renewals will be issued for 24 months (in accordance with the MIP) unless there is a need to issue a short-term certificate to accommodate alignment to the NAA surveillance requirements.

NOTE: The FAA CHDO must provide an annual list of repair station coming due for renewal during the year to the NAA. This will ensure the NAA is aware that specific repair stations are coming due for renewal and the NAA can schedule its surveillance and resources to accommodate the renewal process. The CHDO must recognize that the MIP program requires close cooperation and coordination between the NAA and the CHDO; therefore the FAA should make every attempt to provide the NAA with adequate information to enable the NAA to utilize and schedule its resources in an efficient manner.

(3) The language at the bottom of the form, "Any alteration of this . . . or both," should be crossed out IAW chapter 161.

(4) Where a geographic authorization was issued to an applicant AMO to support a U.S. air carrier or part 129 operators, such authorization will be indicated on the Air Agency Certificate and Repair Station OpSpecs IAW the procedures in chapter 163.

C. FAA Automated Repair Station OpSpecs. The language at the bottom of the form, "Any alteration of this . . . or both," should be crossed out IAW chapter 161.

(1) A statement will be included on the OpSpecs as follows: "The repair station specified on these OpSpecs is performing maintenance on and/or alteration of aircraft and/or aeronautical products to be installed on aircraft under the terms and conditions of BASA and the associated MIP between the U.S. Government and the Government of [insert name of country]."

(2) A statement will be included on FAA's OpSpecs that "the privileges of a line station, as set forth by any NAA or, in the case of the EASA, line station rating, are not authorized when located outside the BASA/MIP country."

(3) For those geographic authorizations outside the country, the repair station OpSpecs will be annotated to indicate that surveillance responsibility remains with the FAA.

(4) FAA-approved process specifications will be recorded on the AMO's Repair Station OpSpecs.

(5) For OpSpecs that reference a Capabilities List, the following (or a similarly worded statement) should be included under the appropriate rating: "Maintenance or alteration functions limited to those make and model components shown on [AMO's] approved Capabilities Document number [XX], dated [XX/XX/XX], as revised."

NOTE: Automated OpSpecs may contain similar worded statements that maybe selected.

(6) The FAA inspector will forward the original certificate and two original OpSpecs to the AMO. The AMO will sign and return one original of the OpSpec to the FAA. The FAA will also provide the NAA with a copy of the certificate and OpSpec by mail or fax.

D. NAA Acceptance of Surveillance. The NAA is required to acknowledge, in writing, its acceptance of the responsibility for the future surveillance and recertification inspections of the applicant AMO.

E. Prepare the Certification Report.

(1) The FAA inspector will prepare and file a Certification Report in the IFO's official file that includes:

- A copy of FAA Form 8400-6
- A copy of the functions the repair station intends on contracting/subcontracting out approved by the NAA
- A completed FAA Form 8310-3, including a copy of the NAA-approved procedures for the AMO to use and revise a CL

- A completed copy of the appropriate NAA surveillance form (FAA Annex to EASA Form 6) that includes FAA Special Conditions with a recommendation
- A copy of the NAA approval certificate and limitations (EASA Form 3 and Approval Schedule)
- A copy of the list of line station locations
- A copy of the list of multiple locations
- A copy of the approved training program's List of Effective Pages signed by the NAA or a copy of the approval letter issued by the NAA on behalf of the FAA
- A copy of FAA Form 8000-4
- A signed copy of the Automated Repair Station OpSpecs
- Copy of fee payment

(2) The FAA inspector will send the applicant AMO's and copy the NAA:

- A copy of FAA Form 8310-3
- The original FAA Form 8000-4
- Automated Repair Station OpSpecs

F. The FAA Inspector will:

(1) Complete the appropriate PTRS file:

(a) Using PTRS codes 3653/5653 when the NAA has performed the surveillance on behalf of the FAA. The FAA inspector should use the comment codes for any significant comments when appropriate. Before closing the 3653/5653 the FAA annex to the surveillance form has several additional PTRS codes that must be closed before closing the 3653/5653.

(b) Check all PTRS codes.

(c) Documenting the Initial Inspection by the NAA in PTRS. Repair station initial inspection accomplished by the NAA is accomplished using the enhanced repair station baseline surveillance program that is located in Order 8300.10, volume 3, chapter 98.

PTRS activity codes 3653 and 5653 are now divided into the same 14 individual PTRS activities that make up the base line inspection for a 3650/5650 surveillance. This chapter has provided guidance for accomplishment of the surveillance of the MIP special conditions by the NAA. It also provides a means to be followed when documenting surveillance. This is to ensure the surveillance is tracked in the same manner as that any other facility located inside or outside of the United States. The baseline surveillance is initiated by opening the PTRS activity code 3653/5653. The aviation safety inspector (ASI), therefore, should enter the PTRS activity codes that correspond to the subject area covered on the FAA annex to EASA Form 6, only the inspection items identified on the FAA annex need to be addressed. When the NAA provides finding information that are not part of the FAA special conditions the FAA inspector will record that information under the appropriate PTRS code, however this is an initial certification therefore there should be no findings. All comments, notes, and discrepancies should be entered; this should be accomplished using existing PTRS procedures identified below.

(d) The incorporation of the enhanced air carrier and repair station outsource oversight system into the FSAS program and into the National Program Guidelines (NPG) system is undergoing reprogramming. In the future, the process will be automated.

NOTE: Each applicable PTRS code will need to be entered as individual entries. This is an interim procedure! The computer program is presently undergoing revision and modification.

- (3601/5601) Parts and Materials
- (3604/5604) Certificate Requirements

- (3605/5605) Records Systems
- (3606/5606) Work Away from station
- (3608/5608) Quality Control
- (3618/5618) Air Carrier & Air Operator requirements
- (3654/5654) Maintenance Process
- (3657/5657) Housing and Facilities
- (3601/5601) Tools and Equipment
- (3659/5659) Personnel Record
- (3660/5660) Manuals
- (3661/5661) Training
- (3663/5363) Contract Maintenance
- (3656/5656) Technical Data

(c) Using PTRS codes 3045/5045 for review of documentation and processing. The FAA inspector should use the comment codes for any significant comments when appropriate.

NOTE: PTRS codes 3655/5655 may be used when the FAA performs the surveillance as part of the sampling inspections, quality audit required by the MIP. The FAA inspector should use the comment codes for any significant comments when appropriate.

(2) Establish the Vital Information Subsystem data file as appropriate from information gathered during the certification phase.